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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area Time-Critical Removal Action
Monthly Report (August 2009)

Dear Mike:

Attached is the 2nd monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the United States Environmental Protection Agency, monthly reports will only be submitted electronically.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.
Vice President

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September 15, 2009

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

REPORT #2, AUGUST 2009

**PREPARED BY ARCADIS
SEPTEMBER 15, 2009**

ON BEHALF OF GEORGIA-PACIFIC, LLC

SUBMITTED TO

**MICHAEL RIBORDY, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #2, AUGUST 2009

Significant Developments and Activities During the Period

- On August 3, ARCADIS received a signed property access agreement for the Steele Trust property (Parcel Nos. 08-033-009-00, 08-033-012-00, and 08-033-018-00).
- On August 4, ARCADIS received a signed property access agreement for the Steele Thompson property (Parcel No. 08-032-005-10).
- On August 4, ARCADIS received permits from the Allegan County Highway Commission to install temporary construction entrances to County roads to support Plainwell No. 2 Dam Area TCRA construction activities.
- On August 6, United States Environmental Protection Agency (USEPA) confirmed that monthly reports will only be submitted electronically.
- On August 7, ARCADIS submitted a revision to the *Plainwell No. 2 Dam Area Time-Critical Removal Action Traffic Control Plan* to USEPA describing a revised route from Staging Area 3 to the landfill.
- On August 7 and 10, ARCADIS received signed property access agreements for the Winkle/Hendricksma property (Parcel No.08-032-033-00).
- On August 7, ARCADIS received a Land Use Permit from Michigan Department of Natural Resources (MDNR) that was dated August 3.
- On August 10, ARCADIS received permission from MDNR to remove vegetation from MDNR property as necessary to support construction activities.
- On August 11, ARCADIS and Georgia-Pacific hosted a construction kickoff and communication meeting with USEPA, Michigan Department of Environmental Quality (MDEQ), MDNR, and the Superfund Technical Assessment & Response Team (START) contractor for USEPA.
- On August 12, ARCADIS discussed with MDEQ data and estimates for discharge concentrations of metals and phosphorus. MDEQ had requested the data and estimates in July as a condition for approval of the Substantive Requirements Document (SRD) application (submitted in July). The data and estimates for discharge concentrations of metals and phosphorus was submitted to MDEQ on August 28.
- On August 12, ARCADIS and MDNR discussed the schedule for the mussel relocation work. The work was performed by Charles Mehne, a MDNR-contractor, during the week of August 17.

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Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #2, AUGUST 2009

- On August 13, ARCADIS submitted to USEPA the signed and sealed final design contract drawings.
- On August 14, ARCADIS submitted to USEPA the 1st *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for July 2009.
- On August 14, ARCADIS received a permit to install a private grade crossing from Watco Companies for the railroad crossing located in the access road from Riverview Drive to Staging Area 3.
- On August 17, ARCADIS forwarded to USEPA equipment specifications for the telemetry turbidity monitoring equipment to be used for the Plainwell No. 2 Dam TCRA.
- On August 18, ARCADIS received written permission from MDNR to install river closure buoys and signage in the River prior to receipt of the Buoy Permit. The executed Buoy Permit (dated August 24) was received by ARCADIS on August 31.
- On August 21, ARCADIS submitted the 1st and 2nd *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- In compliance with Paragraph 21b of the AOC, on August 21, ARCADIS requested approval from USEPA to dispose of waste at the three proposed landfills – C&C Landfill in Marshall, Michigan, Ottawa County Farms Landfill in Coopersville, Michigan, and Wayne Disposal in Belleville, Michigan. On August 24, USEPA confirmed that all three landfills were permitted to receive waste material regulated by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Off-Site Rule.
- On August 24, ARCADIS submitted a signed property license agreement to Consumers Energy. Consumers Energy prepared the license agreement prior to ARCADIS' signing. Consumers Energy will execute the agreement during the week of September 1 and submit a final copy to ARCADIS.
- On August 24, ARCADIS submitted subcontractor notifications to USEPA for the following companies: American Environmental Group, Ltd.; JF New; Terra Contracting, LLC; KAR Laboratories, Inc.; and TestAmerica, Inc.
- On August 31, ARCADIS received from MDNR permission to dispose of all timber harvested from MDNR land during construction activities.
- As of August 31, ARCADIS had received access to seven out of ten private properties (Table A).

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #2, AUGUST 2009

Data Collected and Field Activities Conducted During the Period

- During the week of August 3, ARCADIS began mobilizing equipment and began installing an access road from Riverview Drive to Staging Area 3. Nine pre-construction soil samples (TS10026 through TS10034) were collected from 200-foot intervals along the access road prior to construction. A five-part composite sample (TS10035) was collected from the four corners and center of Staging Area 3, prior to construction. Per the access agreement for the Steele Thompson property, the pre-construction condition of the staging area and access road was surveyed, and top soil was measured and stockpiled prior to construction of the staging area.
- During the week of August 10, ARCADIS continued mobilization activities, continued installation of the access road from Riverview Drive to Staging Area 3, began construction of Staging Area 3, and improved the railroad crossing located on the access road. Two fill samples (TS10036 and TS10037) were collected from sources of sand to be used as fill and 21AA aggregate to be used to construct access roads, respectively.
- During the week of August 17, ARCADIS began clearing the grubbing of the haul road from Staging Area 3 to the Kalamazoo River, began clearing and grubbing the haul road along the Kalamazoo River, and installed river closure buoys upstream and downstream of the work area. Two pre-construction soil samples (TS10038 and TS10039) were collected at 200-foot intervals from the haul road located between Staging Area 3 and the Kalamazoo River. The owner of the property was onsite to remove mature trees located within the haul road.
- During the week of August 24, ARCADIS continued clearing and grubbing of the haul road along the Kalamazoo River, began installation of the haul road from Staging Area 3 to the Kalamazoo River, installed river closed signage at the D Avenue launch point, D Avenue Bridge, railroad trestle, Main Street launch point, and M-89 Bridge, and installed river closure buoys near the diversion structures and mill race. Aggregate material from the remaining haul roads at the Former Plainwell Impoundment TCRA was removed and transported for use at the Plainwell No. 2 Dam project. Two pre-construction soil samples (TS10040 and TS10041) were collected at 200-foot intervals from the haul road located between Staging Area 3 and the Kalamazoo River.
- On August 31, ARCADIS continued clearing and grubbing of the haul road along the Kalamazoo River and continued installation of the haul road from Staging Area 3 to the Kalamazoo River. Aggregate material from the remaining haul roads from the Former Plainwell Impoundment TCRA was removed and transported for use at the Plainwell No. 2 Dam project.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #2, AUGUST 2009

Laboratory Data Received During the Period

- No analytical data was received during the weeks of August 3, 10, 17, or on August 31.
- During the week of August 24, ARCADIS received analytical data for pre-construction soil samples TS10026 through TS10035 and fill material samples TS10036 and TS10037. Sample results are summarized on Table B.
- ARCADIS is awaiting analytical data from pre-construction soil samples TS10038 through TS10041.

Issues Encountered and Actions Taken

- The owner of the McMurtrie property verbally confirmed that he would not sign the access agreement if the proposed location of Staging Area 2 was not altered because he is concerned it will interfere with daily activities on his property, which is currently utilized as a horse training facility. The proposed location for Staging Area 2 is located on the Simons' property adjacent to the McMurtrie property. The owner of the Simons property does not wish to alter the location of Staging Area 2. ARCADIS will continue to discuss property access with the property owner throughout September (Table A).
- The owners of the Simons property have verbally accepted the locations of staging areas and access roads located on their properties. ARCADIS and Georgia-Pacific are negotiating a compensation package with the owner of the Simons property for access to their properties. ARCADIS gave the owners of the Simons properties a tour of Staging Area 3 on August 27. Georgia-Pacific is scheduled to meet with the owners of the Simons property in September to discuss property access (Table A).

Developments Anticipated During the Next Reporting Period

- During the week of September 1, ARCADIS is scheduled to receive an executed property license agreement from Consumers Energy and to continue site preparation activities on the northern side of the River. This work will include installation of a railroad crossing, clearing and grubbing, installing site security measures, installing resuspension controls, and constructing haul roads and staging areas.
- During the week of September 7, ARCADIS is scheduled to continue site preparation activities on the northern side of the River.
- During the week of September 14, ARCADIS is scheduled to host the monthly Stakeholder's Meeting in Plainwell and to continue site preparation activities on the northern side of the river

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Plainwell No. 2 Dam Area TCRA**

REPORT #2, AUGUST 2009

- During the week of September 21, ARCADIS is scheduled to begin soil/sediment removal activities in Removal Area 1.
- During the week of September 28, ARCADIS is scheduled to continue soil/sediment removal activities in Removal Area 1, install resuspension controls at Island 1, and begin loading and transporting solidified material to the appropriate landfill.
- In September, ARCADIS will continue submitting Weekly Construction Reports for the Plainwell No. 2 Dam Area TCRA to USEPA.
- In September, ARCADIS will begin submitting copies of analytical data from Plainwell Dam No. 2 TCRA sampling activities to USEPA.
- Throughout September, ARCADIS will, as necessary, submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 10 of the Plainwell No. 2 Dam Area TCRA AOC.

Updates to the Former Plainwell Impoundment TCRA

- On August 5, the USEPA determined that the July 2009 report would be the final Former Plainwell Impoundment TCRA Monthly Report. Future updates on the project will be included in the Plainwell No. 2 Dam Area TCRA monthly report.
- On August 11, ARCADIS met with MDNR and Consumers Energy to discuss the location of a fence to be installed near the Plainwell Dam to prevent vehicular access. On August 24, ARCADIS submitted a figure to MDNR and Consumers Energy that showed the approved location of the fence. All parties agreed on the fence location, and it will be installed in September.
- On August 14, the KRSG submitted the 29th *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for July 2009 to USEPA. As noted above, this report was the final monthly report submitted to USEPA for the Former Plainwell Impoundment TCRA.
- On August 14, ARCADIS submitted a draft of the *Final Construction Completion Report* to USEPA, MDEQ, and MDNR.
- On August 18, approximately 35 cubic yards of material was removed near the gas pipelines located near Removal Areas 10A and 11A of the Former Plainwell Impoundment TCRA. Representatives from USEPA, MDNR, Consumers Energy, and Michigan Gas Utilities were onsite to observe the excavation.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #2, AUGUST 2009

- During the week of August 24 and on August 31, aggregate material from the remaining haul roads at the Former Plainwell Impoundment TCRA was removed for re-use at the Plainwell No. 2 Dam Area TCRA. The top 6 inches of the haul roads were removed and disposed off-site at the conclusion of the Former Plainwell Impoundment TCRA. The underlying material is being re-used. Geotextile fabric used as base for the haul roads was transported to an offsite commercial landfill for disposal.
- On August 31, USEPA forwarded to ARCADIS the oversight cost recovery invoice for the period from February 22, 2008 through February 28, 2009 in accordance with Section XV of the 2007 AOC.

**Georgia-Pacific, LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
Monthly Report #2, August 2009**

Table A — Summary of Property Access Agreements (as of August 31, 2009)

Date Sent	Property Owner	Pacel Number	Status
6/10/2009	Arcan Inc.	08-032-010-00	accepted (received 6/18/09)
5/22/2009	Consumers Energy	08-032-015-00	signed license agreement submitted to Consumers during the week of August 24, awaiting executed copy for Consumers
7/31/2009	Diana Steele Thompson	08-032-005-10	accepted (received 8/4/09)
5/22/2009	Edward and Ronald Hodgman	08-032-027-00	accepted (received 6/3/09)
5/22/2009	Edward Mc Murtrie	08-032-042-00	rejected initial agreement
5/22/2009	Howe Aluminum Products	08-032-028-00	accepted (received 6/3/09)
7/31/2009	MDNR	08-032-041-00 08-032-040-00	accepted (received 8/7/09)
5/22/2009	Michelle and Paul Simons	08-032-034-10 08-032-039-00 08-032-006-00	in negotiations
7/29/2009	Steele Trust	08-033-012-00 08-033-009-00 08-033-018-00	accepted (received 8/3/09)
8/4/2009	Ray Hendricksma	08-032-033-00	accepted (received 8/7/09)
	Terry Winkle		accepted (received 8/10/09)

Georgia-Pacific, LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Monthly Report #2, August 2009

Table B — Summary of Samples Collected and Data Received in August 2009

Sample ID	Date Sent	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Pre-Construction Soil Samples									
TS10026	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (north of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10027	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (north of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10028	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (north of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10029	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (north of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10030	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (south of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10031	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (south of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10032	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (south of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10033	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (south of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10034	08/05/09	08/24/09	093060	KAR Labs	Access road from Riverview Drive to SA3 (south of railroad crossing)	PCBs	< 0.33 mg/kg	-	None
TS10035	08/05/09	08/24/09	093060	KAR Labs	5-part composite sample from SA3	PCBs	< 0.33 mg/kg	-	None
TS10038	08/19/09	NR	NR	KAR Labs	Haul road from SA3 to Kalamazoo River	PCBs	-	-	-
TS10039	08/19/09	NR	NR	KAR Labs	Haul road from SA3 to Kalamazoo River	PCBs	-	-	-
TS10040	08/25/09	NR	NR	KAR Labs	Haul road from SA3 to Kalamazoo River	PCBs	-	-	-
TS10041	08/25/09	NR	NR	KAR Labs	Haul road from SA3 to Kalamazoo River	PCBs	-	-	-
Fill Material Sampling									
TS10036	08/10/09	08/24/09 (KAR) and 08/26/09 (TAL)	093061 (KAR) and KAL472 (TAL)	KAR Labs and TAL	9-part composite sample from sand material to be used as backfill	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, DROs, GROs, and TCL Pesticides	< 0.33 mg/kg	4 mg/kg	None ¹
TS10037	08/10/09	08/24/09 (KAR) and 08/26/09 (TAL)	093061 (KAR) and KAL472 (TAL)	KAR Labs and TAL	9-part composite sample from 21AA aggregate material to be used to construct access roads	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, DROs, GROs, and TCL Pesticides	< 0.33 mg/kg	4 mg/kg	None ¹

Notes:

1 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDEQ's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).

* Duplicate samples are shown in brackets.

* Analytical results have not been validated.

DRO - diesel range organic

GRO - gasoline range organic

MDEQ - Michigan Department of Environmental Quality

NR - not received

SVOCs - semivolatile organic compounds

TAL - TestAmerica Laboratories

TCL - target compound list

PCBs - polychlorinated biphenyls

RBSL - Risk Based Screening Level

RCRA - Resource Conservation and Recovery Act

RRD - Remediation Redevelopment Division

SA - Staging Area

VOCs - volatile organic compounds

mg/kg - milligrams per kilogram